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United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

JUL 29 2014

David J. Bradley, Clerk

UNITED STATES OF AMERICA

v.

MARCOS ANTONIO
ZAMORANO-GARCIA

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§
§

Criminal No. M-14-839-S1

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

Count One

From on or about May 1, 2014 to on or about May 12, 2014, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

MARCOS ANTONIO ZAMORANO-GARCIA

knowing and in reckless disregard of the fact that individuals, who were aliens, who had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire and agree with other persons known and unknown to the Grand Jurors to conceal, harbor, and shield from detection said aliens in any place, including any building or any means of transportation, to wit: in a residence near Weslaco, Texas.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).

Count Two

From on or about May 1, 2014 to on or about May 12, 2014, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

MARCOS ANTONIO ZAMORANO-GARCIA

knowing and in reckless disregard of the fact that Lazaro Castillo-Romero was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly conceal,

harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said alien in any place, including any building or any means of transportation, to wit: in a residence near Weslaco, Texas, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

Count Three

From on or about May 10, 2014 to on or about May 12, 2014, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

MARCOS ANTONIO ZAMORANO-GARCIA

did knowingly and intentionally conspire and agree with other person or persons known and unknown to the Grand Jurors, to seize and detain and threaten to kill, injure, and continue to detain individuals, in order to compel a third person to do an act, that is, to pay a sum of money, as an explicit and implicit condition for the release of the persons detained.

In violation of Title 18, United States Code, Section 1203.

Count Four

From on or about May 10, 2014 to on or about May 12, 2014, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

MARCOS ANTONIO ZAMORANO-GARCIA

did knowingly and intentionally seize and detain and threaten to kill, injure, and continue to detain Julian Suav-Panjoj, in order to compel Paula Toj-De La Cruz to pay a sum of money as an explicit and implicit condition for the release of Julian Suav-Panjoj.

In violation of Title 18, United States Code, Sections 1203 and 2.

Count Five

From on or about May 10, 2014 to on or about May 12, 2014, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

MARCOS ANTONIO ZAMORANO-GARCIA

did knowingly and intentionally seize and detain and threaten to kill, injure, and continue to detain Grecia Denise Lopez-Chavez, in order to compel Juan Carlos Vasquez-Aceituno to pay a sum of money as an explicit and implicit condition for the release of Grecia Denise Lopez-Chavez.

In violation of Title 18, United States Code, Sections 1203 and 2.

Count Six

From on or about May 10, 2014 to on or about May 12, 2014, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

MARCOS ANTONIO ZAMORANO-GARCIA

did knowingly and intentionally seize and detain and threaten to kill, injure, and continue to detain Reyna Gonzalez-Ramirez, in order to compel Santos Reynoso to pay a sum of money as an explicit and implicit condition for the release of Reyna Gonzalez-Ramirez.

In violation of Title 18, United States Code, Sections 1203 and 2.

Count Seven

From on or about May 10, 2014 to on or about May 12, 2014, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

MARCOS ANTONIO ZAMORANO-GARCIA

did knowingly and intentionally seize and detain and threaten to kill, injure, and continue to detain Margarita Cardona-Rosario, in order to compel Jose Marroquin to pay a sum of money as an explicit and implicit condition for the release of Margarita Cardona-Rosario.

In violation of Title 18, United States Code, Sections 1203 and 2.

Count Eight

From on or about May 10, 2014 to on or about May 12, 2014, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

MARCOS ANTONIO ZAMORANO-GARCIA

did knowingly and intentionally seize and detain and threaten to kill, injure, and continue to detain Tomas Panjoj-Chitic, in order to compel Antonio Tecum to pay a sum of money as an explicit and implicit condition for the release of Tomas Panjoj-Chitic.

In violation of Title 18, United States Code, Sections 1203 and 2.

Count Nine

From on or about May 10, 2014 to on or about May 12, 2014, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

MARCOS ANTONIO ZAMORANO-GARCIA

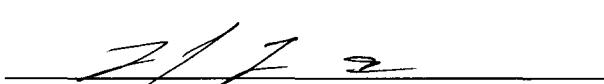
did knowingly and intentionally seize and detain and threaten to kill, injure, and continue to detain Maria Gladis Zelaya, in order to compel Angela Aguila-De Merlos to pay a sum of money as an explicit and implicit condition for the release of Maria Gladis Zelaya.

In violation of Title 18, United States Code, Sections 1203 and 2.

A TRUE BILL.

FOREPERSON

KENNETH MAGIDSON
UNITED STATES ATTORNEY


ASSISTANT UNITED STATES ATTORNEY